

## ANIMAL PLACE

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9 August 1999

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, MD 20852

Re: Docket numbers: 98N-1230; 96P-0418; 97P-0197

To Whom It May Concern:

On behalf of Animal Place and all its members, I urge you to take action to prevent human illness that is associated with *Salmonella enteritidis* infection.

Although I understand that you are contemplating putting warning labels on egg cartons and regulating egg refrigeration temperatures, this is insufficient to protect the public. A *major source* of Salmonella enteritidis *infection is through hens who are subjected to the industry standard of 'forced molting'* It is irrefutable that forced molting, whereby hens are deprived of food for up to 2 weeks and sometimes water up to 3 days, causes extreme metabolic distress. This increases infection of the hens with *Salmonella enteritidis* and increases the shedding of the organisms, resulting in contamination of eggs.

The most important step you could take would be to ban forced molting, treating it as a public health issue. You have the jurisdiction to ban any 'farm' practice which might cause injury to the public.

You were petitioned to ban forced molting in April of this year. I urge you to grant this petition without delay.

With reverence for all life.

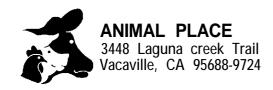
Nedim C. Buyukmihci, V.M.D.

Secretary/Treasurer

NCB:ztp

968-0418

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## **CROSS FILE SHEET**

98N-1230/C199 File Number:

97P-0197/ C 20 0 96P-0418/ C 199 See File Number: